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October 15, 2020

GRAND RAPIDS MI

Via ECF- Letter Motion

The Honorable Andrew L. Carter, Jr. United States District Judge United States District Court, Southern District of New York 40 Foley Square New York, New York 10007

MEMO ENDORSED

Re:

Vuppala v. J.P.G., LLC, et al. Case No.: 19-cv-04233-ALC

Dear Judge Carter:

We represent Defendant, J.P.G. LLC, in the above-captioned matter. We write jointly with Plaintiff's counsel, Brad Weitz, Esq., and co-defendant's counsel, Jeffrey Chancas, Esq., in accordance with Your Honor's September 17, 2020 Order [ECF No. 41]. At this time, the parties are jointly requesting an extension of the existing stay in this matter.

As we stated in our prior letters, due to the ongoing national health crisis caused by the COVID-19 pandemic, coupled with the mandated closure of non-essential public businesses in New York City, which has adversely affected the business in this matter, it is very difficult for the parties to proceed in this matter with discovery and productive settlement negotiations at this time.

Therefore, the parties jointly hereby respectfully request that the Court grant an additional sixty (60) day stay of all deadlines and/or any conference in this matter. The undersigned has conferred with all counsel who join in on this request. We thank you for your attention and consideration.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ Joseph J. DiPalma Joseph J. DiPalma

It is hereby ORDERED that an additional 60-day stay is GRANTED. As this is the fourth request for a stay, no further requests will be granted, absent good cause

shown.

HON, ANDREW L. CARTER, JR. UNITED STATES DISTRICT JUDGE

O ORDERED:

Dated: October 16, 2020

cc: Brad Weitz (via ECF) Jeffrey C. Chancas (via ECF)